

Honorable Tana Lin, United States District Judge

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

JEFFERY S. MARTIN,

Plaintiff,

v.

PIERCE COUNTY, a Washington political
subdivision; PIERCE COUNTY DOE CORRECTION
OFFICERS 1-10, in their individual and official
capacities; NAPHCARE, INC., an Alabama
corporation doing business in the State of Washington;
MIGUEL BALDERRAMA, M.D., in his official and
individual capacity; JANEL FRENCH LPN, in her
official and individual capacity; IRINA HUGHES, in
her official and individual capacity; and NAPHCARE
DOE EMPLOYEES 1-10, in their individual and
official capacities;

Defendants.

NO. 3:20-cv-05709-TL

MOTION AND AGREED
STIPULATION TO EXTEND CASE
SCHEDULE DATES

NOTED DATE FOR
CONSIDERATION:
DECEMBER 28, 2022

I. RELIEF REQUESTED

COMES NOW Plaintiff Jeffery S. Martin, and Defendants Pierce County and NaphCare Inc., by and through their attorneys, and hereby stipulate and agree—pursuant to LCR 16(b)(6) and LCR 37(a)(1)—that depositions of witnesses identified and requested before the discovery cutoff of January 6, 2023, may be conducted after up until February 3, 2023.

1 **II. FACTS**

2 The parties, through their undersigned counsel of record, respectfully submit this
3 stipulated motion seeking modification of the case schedule. Additional time is needed to
4 conduct witness depositions due to witness scheduling issues. The parties are cooperating in
5 scheduling depositions, but the process is still ongoing. This agreement may also assist in
6 narrowing issues by agreement or motion and may potentially assist in resolution of the case.
7

8 **III. CONCLUSION**

9 For the forgoing reasons, the parties jointly ask this Court to grant their motion.
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12 DATED this 28th day of December, 2022.

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14 BOYLE MARTIN THOENY, PLLC

15 /s Bardi D. Martin
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26 /s Ross Taylor per email authorization
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1 Attorneys for Defendant NaphCare, Inc.,
2 Janel French, LPN, and Irina Hughes

3
4
5 MARY E. ROBNETT
6 Prosecuting Attorney

7 /s Kerri Jorgensen per email authorization
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14 Pursuant to the Parties' stipulation above, it is SO ORDERED.

15 Dated this 4th day of January 2023.

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Tana Lin
United States District Judge